

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

ANTHONY BUCCI

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No. 04-cr-10194-RCL

**MOTION TO EXPEDITE RULING ON “MOTION TO MODIFY TEMPORARILY  
TERMS AND CONDITIONS OF RELEASE” DATED MAY 24, 2005**

The defendant respectfully moves the Court to expedite its ruling on his Motion to Modify Temporarily Terms and Conditions of Release dated May 24, 2005.

In support hereof, the defendant respectfully says:

1. On May 20, 2005 his attorney left a voice-mail message for the prosecutor in this case, AUSA John McNeil, soliciting the government’s assent to the defendant’s subject motion.
2. On May 23, 2005 counsel for the defendant was out of the office assisting his wife who underwent a medical procedure that required her to be cared for on that day.
3. On May 24, 2005 counsel for the defendant called the prosecutor on the telephone, and was told that the government would not assent to, and would oppose, the defendant’s subject motion.
4. As a consequence of this sequence of events, there are fewer than 14 days left before the defendant’s daughter’s graduation, and without an expedited ruling, the subject motion will be rendered moot.

Anthony Bucci  
By his attorney,

/s/Michael F. Natola

May 24, 2005

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MICHAEL F. NATOLA  
BBO No. 367580  
63 Atlantic Avenue  
Boston, Massachusetts 02110  
Tel. (617) 367-1199  
Fax (617) 227-3384  
E-mail [MFNatola@aol.com](mailto:MFNatola@aol.com)

**CERTIFICATE OF SERVICE**

I, Michael F. Natola, attorney for the defendant herein, hereby certify that a true copy of the foregoing motion was served the above date upon the following persons electronically:

John T. McNeil, Esquire  
Assistant United States Attorney  
One Courthouse Way, Suite 9200  
Boston, MA 02210

Mr. David Picozzi  
Pretrial Services Office  
One Courthouse Way  
Boston, MA 02210

/s/Michael F. Natola

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MICHAEL F. NATOLA